

**THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI**

AB,

Plaintiff,

v.

HRB Professional Resources LLC

Serve: CT Corporation System
120 South Central Avenue
Clayton, Missouri 63105

Defendant.

Case No.

JURY TRIAL REQUESTED

PLAINTIFF’S MOTION FOR LEAVE TO PROCEED ANONYMOUSLY

Plaintiff AB, through his attorneys, moves this Court for leave to proceed anonymously in this case. In support of this Motion, Plaintiff states the following:

1. Plaintiff has filed his initial Complaint alleging disability discrimination simultaneous with this Motion.
2. Because of the sensitive nature of the disability at issue, Plaintiff wishes to remain anonymous.
3. While Fed.R.Civ.Pro Rule 10(a) generally requires that the complaint “name all parties,” the Eighth Circuit has recognized that courts have given leave to proceed anonymously when, among other things, the matter requires plaintiff to disclose “information of the utmost intimacy.” *Roe v. St. Louis University*, 2009 WL 910738 at * 3 (E.D. Mo. 2009).
4. Further, because of the underlying administrative process, Defendant is aware of Plaintiff’s identity and will not suffer any prejudice from Plaintiff’s request to remain anonymous.

5. Plaintiff's privacy interest in protecting his private medical information outweighs the public interest in knowing who is using the courts.

For the foregoing reasons, Plaintiff moves this Court to grant him leave to proceed anonymously in this action.

Respectfully submitted,

DUGAN SCHLOZMAN LLC

/s/ Mark V. Dugan

Heather J. Schlozman, MO Bar # 43234

Mark V. Dugan, MO Bar # 39639

heather@duganschlozman.com

mark@duganschlozman.com

8826 Santa Fe Drive, Suite 307

Overland Park, Kansas 66212

Telephone: (913) 322-3528

Facsimile: (913) 904-0213

Counsel for Plaintiff